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August 16, 2002

Ex Parte

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W., TW-B204
Washington, D.C. 20554

Re: Application of Qwest Communications International, Inc.
To Provide In-Region InterLATA Services in the States of Colorado,
Idaho, Iowa, Nebraska and North Dakota. WC Docket No. 02-148

Application of Qwest Communications International, Inc.
To Provide In-Region InterLATA Services in the States of Montana,
Utah, Washington & Wyoming. WC Docket No. 02-189

Dear Ms. Dortch:

Qwest hereby responds to a question from the Wireline Competition Bureau regarding the difference between design services versus nondesign services.

Designed services require a more complex provisioning process than non-designed services.

The provisioning process for a designed circuit includes design engineering and determination of transmission paths and/or additional test parameters to meet the specifications of each circuit. Skilled Engineering employees analyze, create, and install the circuit. Designed services are generally identified by circuit number.

A non-designed line is often referred to as a Plain Old Telephone service. The provisioning process is simpler than for a designed service and the transmission path is usually Voice Grade analog. Non-designed services are generally identified by telephone number.

The terms "designed" and "non-designed" services are general telecom industry terms and are not specifically defined in the record of this Application.

Non-Designed Products

- Resale
 - Residential single line service
 - Business single line service
 - Centrex
 - Centrex 21
 - Basic ISDN *
 - Qwest DSL
- Unbundled Network Element – Platform (UNE-P) (POTS)
- Unbundled Network Element – Platform (UNE-P) (Centrex 21)
- Unbundled Network Element – Platform (UNE-P) (Centrex)
- Shared Loop/Line Sharing
- Sub-Loop Unbundling

Designed Products

- Resale
 - PBX Trunks *
 - Primary ISDN *
 - DS0
 - DS1
 - DS3 and higher bit-rate services (aggregate)
 - Frame Relay
- LIS Trunks
- Unbundled Dedicated Interoffice Transport (UDIT)
 - UDIT – DS1 level
 - UDIT – Above DS1 level
 - Dark Fiber – IOF
- Unbundled Loops:
 - Analog Loop
 - Non-loaded Loop (2-wire)
 - Non-loaded Loop (4-wire)
 - DS1-capable Loop
 - ISDN-capable Loop
 - ADSL-qualified Loop
 - Loop types of DS3 and higher bit-rates (aggregate)
 - Dark Fiber – Loop
 - Loops with Conditioning
- E911/911 Trunks
- Enhanced Extended Links (EELs)

* For limited order activity types, provisioning results for these services may be reported designed rather than non-designed and vice versa

The twenty-page limit does not apply as set forth in DA 02-1390 and DA 02-1666.

Sincerely,

Harold Hamer

cc: M. Carowitz
E. Yockus
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M. Cohen
R. Harsch
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J. Stanley
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S. Oxley

QUESTION:

Provide a description of the router test and a description of any test of line shared loop quality provided to CLECs.

RESPONSE:

Qwest's router test consists of placing a DSL test set on a loop that is connected to a DSLAM and performing a battery of tests intended to verify physical connectivity, ATM layer synchronization, IP layer routing and connections, applications, and service rates. Essentially, this testing assures data synchronization between the end user customer's CPE and the ISP through the DSLAM, ATM, and their connections.

Since Qwest is not responsible for the full connectivity between the CPE and ISP and because Qwest does not know the flavor of DSL and Quality of Service (QoS) guaranteed to the end user customer, it provides a line shared loop that is electrically continuous. In the provisioning process, Qwest assures there are no electrical encumbrances, such as load coils, on the loop and performs a continuity test using a device called a LSVT. The LSVT test not only tests for electrical continuity but, also, tests to ensure the jumpers are not reversed causing a blockage of the data signal. Qwest does not have the obligation to ensure the performance of the CLEC equipment.

QUESTION:

When providing line shared loops, why does Qwest use a "router test" for itself and a different test of end-to-end data continuity for Covad and other CLECs?

RESPONSE:

Router testing can have several meanings so, for the purpose of this discussion, a Qwest router test involves a Qwest technician placing a hand held test device on a circuit that is connected to a DSLAM and performing a battery of tests to validate the data is working in the fashion desired.

Router testing applies when Qwest is providing the data service. Continuity testing applies when Line Sharing to ensure that the physical connections have been provisioned (wired) correctly, allowing the data service provider to perform "service" tests with confidence that the any problem is not the result of lack of physical continuity.

Qwest's hand held test device not only tests the physical path (circuit continuity) of the circuit but also extends into the service, or protocol, and ATM layers of the signal. This testing, for example, allows for determination of the Quality of Service (QoS) (QoS is essentially guaranteed bandwidth and traffic management parameters in terms of delay). With router testing, Qwest is testing the entire DSL service provided to its customer

including linkage and QoS between the DSL modem, the DSLAM, the ATM, and the ISP. Qwest doesn't only test the physical linkage of the circuitry but, also, the DSL service itself.

Circuit continuity testing provides assurance that there is physical, or electrical, continuity throughout the circuit. This means that all jumpers are in place in the right sequence (i.e., the jumpers aren't reversed blocking the data signal). This is the physical path associated with the circuit. Router testing goes well beyond the requirements of testing the line sharing UNE into testing the CLEC's DSL service (for Qwest to be able to perform the router test, the CLECs would have to provide all relative technical information about its DSLAM so the technician can apply the proper settings on the test equipment.)

In the July 13, 2001 Washington Checklist workshop, this issue was vetted and resolved to Covad's satisfaction (Appendix K @Tab 795, pages 4787-4789). In this workshop, Qwest agreed to perform circuit continuity testing for line shared loop provisioning and repair. Qwest has since implemented circuit continuity testing across all 14 ILEC states and has equipped its technicians with LSVT test sets to perform this test. Furthermore, when testing for circuit continuity, the router test does not provide any additional information than is not already provided by the LSVT test set.